

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

(MIAMI DIVISION)

**JANE DOE,**

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

**STEVEN K. BONNELL II,**

Defendant.

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**PLAINTIFF’S MOTION SUBMITTING AMENDMENT TO DECLARATION IN  
SUPPORT OF OPPOSITION TO MOTION TO DISMISS AMENDED COMPLAINT**

COMES NOW Plaintiff Jane Doe, by and through the undersigned counsel, and hereby submits an amendment to the declaration submitted in support of Plaintiff’s Opposition to Defendant’s Motion to Dismiss Amended Complaint (“Opposition”)(ECF 139), and respectfully states as follows:

1. On October 3, 2025, Plaintiff submitted her Opposition to Defendant’s Motion to Dismiss, along with a declaration in support thereof from Plaintiff’s forensic expert, Mr. Jesus Pena (“October 3<sup>rd</sup> Declaration”)(ECF 139-1). On or about October 7, 2025, Mr. Pena became aware of an issue affecting his interpretation of the evidence as set forth in paragraphs 17 and 18 of his October 3<sup>rd</sup> Declaration. Accordingly, attached hereto as **Exhibit 1** is an Amendment to the Declaration of Jesus Pena. This amendment *only* affects paragraphs 17 and 18 of the October 3<sup>rd</sup> Declaration.

2. Plaintiff’s Opposition relied on paragraphs 17 and 18 of the October 3<sup>rd</sup> Declaration for two paragraphs of her Opposition: the last paragraph on page 7, and the first paragraph on page

8. These two paragraphs are no longer supported, and should be disregarded by the Court. The remainder of the Opposition remains unaffected by the Amendment to Declaration.

WHEREFORE, Plaintiff respectfully requests that this Court accept the Amendment to Declaration and deny Defendant's Motion to Dismiss the Amended Complaint for Lack of Subject Matter Jurisdiction, and allow such other relief as warranted.

Respectfully submitted,

Dated: October 8, 2025.

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By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 8, 2025 a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.



By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ  
Attorney for Plaintiff